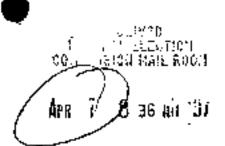


Ohio Republican Party

Robert T. Bennett Chairman

Martha C. Moore Vice^lChairman



Federal Election Commission 999 "E" Street NW Washington, DC 20463

Attn: Melissa Hurd, Reports Analyst

March 31, 1997

C101622339

RE: Ohio Republican State and Central Executive Committee

October Quarterly Report (771796-9/30/96)

Dear Ms. Hurd:

This letter is in response to the Commission's request for additional information regarding the above referenced reporting period. An itemization follows:

You have received contributions from Benesch, Friedlander, Coplan, etc. in the amount of \$1250.00 which needs to be attributed to partners based upon percentage of ownership.

This is a law firm operating as a partnership with 65 partners, allocating the \$1250,00 contribution results in a per partner contribution of \$19.23 which is below the \$200 reporting threshold therefore, the breakdown by partners was not reported.

You have received contributions from Crabbe, Brown, Jones, Potts etc., in the amount of \$500.00 which needs to be attributed to partners based upon percentage of ownership.

This is a law firm operating as a partnership with 19 partners, allocating the \$500.00 contribution results in a per partner contribution of \$26.31 which is below the \$200 reporting threshold therefore, the breakdown by partners was not reported.

APR 17 1997

Schedule A of your report discloses contributions which appears to exceed the limits set forth in the Act which are in excess of \$5,000 per calendar year.

Robert Castellini: Of the \$6,000 total contributions reported, \$1,000 was reported in error as these funds were actually deposited at the county level, Hamilton County Republican Party deposited these funds into their state account. Schedule A for the April 15, 1996 quarterly report has been corrected accordingly and is included with this response.

211 S-Eitth Street, Columbus, Ohio 492] 5 • (614) 228-2481 • Fex (614) 228-1093

George Juilfs: Of the \$6,000 total contributions reported, \$1,000 was reported in error as these funds were actually deposited at the county level, Hamilton County Republican Party deposited these funds into their state account. Schedule A for the April 15, 1996 quarterly report has been corrected accordingly and is included with this response.

Southwood Morcott: Of the \$6,000 total contributions reported, \$1,000 does represent an excess contribution. These funds have been reattributed to our state funds, copy of check issued is attached as documentation. This transfer to the state account will be reflected on our 1/1/97-6/30/97 report.

Star Bank: The contributions from Star Bank Carp. PAC did exceed the limit by \$2,500. Unfortunately the name was entered two different ways into our computer system which resulted in our not catching the error. This amount has been reattributed to our state funds and is included in the check copy which is attached. This transfer to the state account will be reflected on our 1/1/97-6/30/97 report.

You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. "Best Efforts"

For every entry supporting Line 11 (a)(i); we have clearly indicated if the person was retired, employed or if we had requested the employment information. Attached is a sample copy of our "best efforts" request. If contributor information was unattainable with our first effort, the caging department of our finance division attempted phone contact to obtain the information.

Schedule A supporting Line 12 discloses a transfer-in from the Republican National Committee. Schedule B Line 21(b) reflects payments for various exempt activities. Please clarify the nature of the transfers-in and subsequent payments for all exempt activities.

From time to time the Republican National Committee transfers funds to the Ohio Republican State and Central Executive Committee. None of these funds were used for volunteer, exempt activities nor were these funds used for candidate specific programs.

Please clarify all expenditures made for Party Building Media on Schedule H4.

All expenditures for Party Building Media were for generic party activities and did not mention specific federal candidates and therefore, no allocation to a candidate was required.

Your report discloses in-kind contributions to your committee from the Republican National Committee in amounts totaling \$1758.57 on Schedule A supporting Line 12, and \$3570.42 on Schedule H3 supporting Line 18. Please be advised must also be included as an operating expenditure on Line 21 by reporting on Schedule B or H4.

Please see page 11 of 24 on our II4 for Liner 21A, these payments were reflected as expenditures to Marketing Resource Group.

Schedule H3 of your report discloses a transfer in of \$531,829.92 from the Republican National Committee to pay for Admin/Voter Drive expenses. If the transfer in question was incompletely or incorrectly disclosed, you should amend your report.

The name of the account was incorrectly listed on Schedule H3 page 3 of 18. The transfer was made from the Ohio Republican State and Central Executive Committee Victory 96 State account not the Republican National Committee state election operating account. This page of Schedule H3 has been corrected and is submitted herewith.

Please clarify the purpose of disbursements for Visa/MC fees.

The fee charges shown are automatically withdrawn from our Federal account to cover the expense of our using a Visa/MC system to accept contributions. These are <u>not</u> charges made on a credit card for items or services.

For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a Line 23, contributions to Non-federal candidates and committees should be itemized on Line 29.

Thank you, noted for future reporting.

Schedule A of your report discloses an apparent contribution from a corporation.

Per review, Jim Drake Realty is not a corporation.

Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. State of Ohio tax check-off should be disclosed on Line 17.

Thank you, noted for future reporting.

Should you have any further questions or concerns, please contact us.

Sincerely,

Terri Matthews Controller

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TRANSFERS FROM NON-FEDERAL ACCOUNTS

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3/31/97

PAY TO THE ORDER OF

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COLUMBUS, OHIO 43216 MULTI-CANDIDATE COMMITTEE

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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